

**WEIL, GOTSHAL & MANGES LLP**

Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
Ray C. Schrock, P.C. (*pro hac vice*)  
(ray.schrock@weil.com)  
Theodore Tsekerides (*pro hac vice*)  
(theodore.tsekerides@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
New York, NY 10153-0119  
Tel: (212) 310-8000  
Fax: (212) 310-8007

**KELLER BENVENUTTI KIM LLP**

Tobias S. Keller (#151445)  
(tkeller@kbbkllp.com)  
Peter J. Benvenutti (#60566)  
(pbenvenutti@kbbkllp.com)  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: (415) 496-6723  
Fax: (415) 636-9251

*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☒ Affects Pacific Gas and Electric Company  
☐ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No.  
19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY  
DEFAULT ON DEBTOR'S MOTION  
PURSUANT TO FED. R. BANKR. P.  
4001(d) TO APPROVE STIPULATION  
FOR ADEQUATE PROTECTION OF  
SETOFF RIGHTS OF IMERYS  
FILTRATION MINERALS, INC.**

**[Re: Dkt. No. 6572]**

**REQUEST FOR ENTRY OF ORDER BY DEFAULT**

PG&E Corporation and Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in possession (each, a “**Debtor**,” and collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter an order by default on the *Debtor’s Motion Pursuant to Fed. R. Bankr. P. 4001(d) to Approve Stipulation for Adequate Protection of Setoff Rights of Imerys Filtration Minerals, Inc.* [Docket No. 6572] (the “**Motion**”).

**RELIEF REQUESTED IN THE MOTION**

The Motion seeks an order approving an agreement between the Utility and Imerys Filtration Minerals, Inc., as embodied in the *Stipulation for Adequate Protection of Setoff Rights of Imerys Filtration Materials, Inc.* (the “**Stipulation**”), which was attached to the Motion as **Exhibit A**. A proposed order (the “**Proposed Order**”) was attached as **Exhibit B** to the Motion.

**NOTICE AND SERVICE**

A *Notice of Opportunity for Hearing on Debtor’s Motion Pursuant to Fed. R. Bankr. P. 4001(d) to Approve Stipulation for Adequate Protection of Setoff Rights of Imerys Filtration Minerals, Inc.* was filed concurrently with the Motion on April 1, 2020 [Dkt. No. 6574] (the “**Notice of Opportunity for Hearing**”). The Motion, the supporting declaration of Kelly J. Lack [Dkt. No. 6573], and the Notice of Opportunity for Hearing were served as described in the Certificate of Service of Sonia Akter, filed on April 6, 2020 [Dkt. No. 6653].

The deadline to file responses or oppositions to the Motion has passed, and no oppositions have been filed with the Court or received by counsel for the Debtors.

**DECLARATION OF NO OPPOSITION RECEIVED**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

1. I am an attorney with the firm of Keller Benvenuti Kim LLP, co-counsel for the Debtors.

1           2.       I have reviewed the Court's docket in the Chapter 11 Cases and have determined that  
2 no response or opposition has been filed with respect to the Motion.

3           3.       This declaration was executed in San Francisco, California.

4           WHEREFORE, the Debtors hereby request entry of the Proposed Order substantially in the  
5 form attached to the Motion, granting the Motion as set forth therein.

6 Dated: April 23, 2020

**WEIL, GOTSHAL & MANGES LLP**  
**KELLER BENVENUTTI KIM LLP**

/s/       Dara L. Silveira  
Dara L. Silveira

*Attorneys for Debtors and Debtors in Possession*